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Attorney for Interested Parties Director of Industrial
Relations and Office of Self-Insurance Plans,
California Department of Industrial Relations

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA

In re:

PG&E CORPORATION,
and

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

Tax I.D. No. 94-0742640.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the lead case.*

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11

(Lead Case)
(Jointly Administered)

**NOTICE OF APPEARANCE AND
REQUEST FOR SPECIAL NOTICE**

PLEASE TAKE NOTICE that the Chief Deputy Director/Acting Director of Industrial Relations (“Director”) and the Office of Self-Insurance Plans (“OSIP”), California Department of Industrial Relations, through special counsel John Cumming, Office of the Director of Industrial Relations, hereby enter this appearance in the above-captioned bankruptcy cases pursuant to Section 1109(b) of Title 11 of the United States Code, 11 U.S.C. §§ 101-1532, and Rule 9010(b) of the Federal Rules of Bankruptcy Procedure. The Director and OSIP request that the counsel listed below be added to the official mailing matrix, CM/ECF, and service lists in these cases, and that notice of all matters which may come before the Court and copies of all papers served or required to be served be given to counsel as follows.

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9 This request includes, without limitation, all notices, papers, pleadings, motions, proposed
10 orders, applications, petitions, plans of reorganization or liquidation, disclosure statements, and any
11 other documents or requests for relief submitted to the Court or required to be served, whether
12 formal or informal, whether written or oral, and regardless how transmitted.

13 This notice of appearance and request for special notice shall not constitute a waiver of and is
14 without prejudice to: (1) the Director and OSIP's rights, remedies, claims, actions, defenses, setoffs,
15 or recoupments, in law or in equity, with respect to the above-captioned Debtors and any other
16 entities, either in these cases or in any other action, all of which rights, remedies, claims, actions,
17 defenses, setoffs, and recoupments are hereby expressly reserved; (2) the Director and OSIP's right
18 to trial by jury in any proceeding so triable; (3) the Director and OSIP's right to seek withdrawal of
19 the reference of these cases or any related proceedings; and (4) any objection to the jurisdiction or
20 authority of this Court for any purpose other than with respect to the notice. This notice of
21 appearance and request for special notice shall not constitute, in any way, submission to the
22 jurisdiction of this Court for any particular issues or proceedings and shall not constitute an election
23 of remedies by the Director or OSIP.

24 Dated: March 5, 2019

25 Respectfully submitted,

26 Office of the Director of Industrial Relations

27 By: /s/ John Cumming
28 John Cumming, Special Counsel

Attorney for Interested Parties Director of Industrial
Relations and Office of Self-Insurance Plans,
California Department of Industrial Relations